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December 8, 1998

Mr. K. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: BellSouth Telecommunications, Inc. Entry into Long Distance (InterLATA)
Service in Tennessee Pursuant to Section 271 of the Telecommunications
Act of 1996
Docket No. 97-00309

Dear Mr. Waddell:

This letter is submitted on behalf of NEXTLINK Tennessee, L.L.C. ("NEXTLINK") in response to the November 12, 1998, letter from Guy Hicks, counsel for BellSouth Telecommunications, Inc. ("BellSouth"), to the Tennessee Regulatory Authority ("TRA") concerning the TRA's decision to incorporate in the record of the Section 271 proceeding, captioned above, the evidentiary records from two, telephone directory proceedings (dockets 96-01692 and 98-00654).

Docket 98-00654 is a complaint proceeding brought by NEXTLINK against BellSouth Advertising and Publishing Company ("BAPCO") to enforce the TRA's rules on telephone directories. Mr. Hick's letter states that BellSouth is "troubled" by the agency's decision to take official notice of docket 98-000654 because, he says, the docket has been settled and "thus the matters raised in that proceeding have been rendered moot."

That statement is inaccurate. Although BAPCO and NEXTLINK reached a partial, interim settlement involving the 1999 Nashville area White Pages, there has been no settlement in regard to directories in other cities. In fact, BAPCO is now challenging the TRA's final order before the Tennessee Court of Appeals.

BellSouth also asserts in its November 12 letter that there was no allegation in the complaint by NEXTLINK that "BellSouth failed to comply with any order or rule of the Authority." That statement is misleading. BellSouth has chosen to create a separate corporate

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entity, BAPCO, to handle the publication and distribution of the White Pages, but BellSouth itself remains obliged by state law, the TRA's rules, and BellSouth's own tariffs to publish the White Pages in accordance with the TRA's rules and orders. Any failure by BAPCO to comply with those requirements as alleged by NEXTLINK in docket 98-00654, is, as a matter of law, BellSouth's responsibility.

NEXTLINK endorses the TRA's decision to take notice of the evidentiary record in the two proceedings on telephone directories. The evidence adduced in those proceedings demonstrates BAPCO's pattern of resistance to the TRA's efforts to promote competition and provides additional evidence that BellSouth's Section 271 application should be denied.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/nl

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 1998, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

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